

**JUDGE KRAM**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

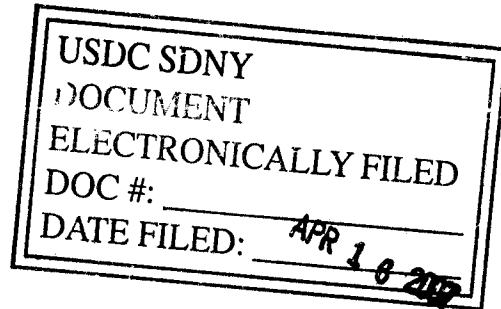
- v. -

LONGYI WANG,  
a/k/a "Jim," and  
ALVIN LU,  
a/k/a "Ping,"

Defendants.

INDICTMENT

**07 CRIM 309**



COUNT ONE

The Grand Jury charges:

1. From at least in or about August 2006, up through and including on or about March 16, 2007, in the Southern District of New York and elsewhere, LONGYI WANG, a/k/a "Jim," and ALVIN LU, a/k/a "Ping," the defendants, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 2320(a).

2. It was a part and an object of the conspiracy that LONGYI WANG, a/k/a "Jim," and ALVIN LU, a/k/a "Ping," the defendants, and others known and unknown, would and did traffic in goods and use a counterfeit mark on and in connection with such goods, to wit, shoes bearing the counterfeit trademark of "Nike," as well as clothing bearing counterfeit trademarks owned

by Major League Baseball and the National Basketball Association.

OVERT ACTS

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts were committed in the Southern District of New York and elsewhere:

a. On or about November 1, 2006, in Queens, New York, LONGYI WANG, a/k/a "Jim," and ALVIN LU, a/k/a "Ping," the defendants, met with a cooperating witness (the "CW") to discuss the sale of counterfeit "Nike" shoes.

b. On or about March 9, 2007, in New York, New York, WANG and LU met with the CW and an undercover law enforcement agent (the "UC") to discuss the sale of counterfeit "Nike" shoes.

c. On or about March 15, 2007, in Carlstadt, New Jersey, WANG met with the CW and the UC to deliver a load of counterfeit "Nike" shoes.

(Title 18, United State Code, Section 371.)

COUNT TWO

The Grand Jury further charges:

4. From at least in or about August 2006, up through and including on or about March 16, 2007, in the Southern District of New York and elsewhere, LONGYI WANG, a/k/a "Jim," and ALVIN LU, a/k/a "Ping," the defendants, and others known and unknown, unlawfully, willfully, and knowingly did traffic and

attempt to traffic in goods and knowingly use a counterfeit mark on and in connection with such goods, to wit, approximately 74,000 pairs of shoes bearing the counterfeit trademark of "Nike," as well as clothing bearing counterfeit trademarks owned by Major League Baseball and the National Basketball Association.

(Title 18, United States Code, Sections 2320(a) and 2.)

	
FOREPERSON	MICHAEL J. GARCIA United States Attorney

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INDICTMENT

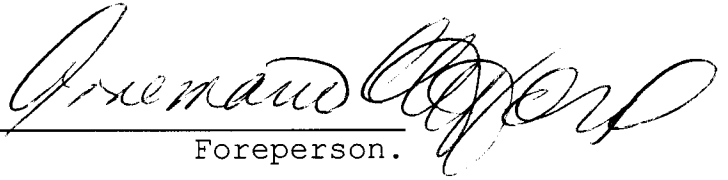
07 Cr. ( )

(18 U.S.C. §§ 371, 2320(a), and 2.)

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MICHAEL J. GARCIA  
United States Attorney.

A TRUE BILL

  
Foreperson.

*Indictment filed, case assigned  
to Judge Kam.*

*F. Mass, USMJ*

*Not in  
RC  
4/10/07*